

MSG

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Filed Under Seal

UNITED STATES OF AMERICA : **CRIMINAL NO. 17- CL 397**
DATE FILED: July 27, 2017

v. :

AYGAZ USTYAN :

FILED**JUL-27 2017**

KATE BARKMAN, Clerk
By _____ Dep. Clerk

VIOLATIONS:

18 U.S.C. § 1029(a)(1) (trafficking of counterfeit access devices - 1 count)
18 U.S.C. § 1029(a)(3) (possession of 15 or more counterfeit access devices - 1 count)
18 U.S.C. § 1028A (aggravated identity theft – 5 counts)

INDICTMENT**COUNT ONE****THE GRAND JURY CHARGES THAT:**

1. On or about October 29, 2014, in the Eastern District of Pennsylvania,
defendant

AYGAZ USTYAN

knowingly and with the intent to defraud, trafficked, by providing to another person known to the grand jury, the following counterfeit access devices, in the form of American Express prepaid gift cards and Bluebird debit cards that were encoded with credit and debit account numbers issued to other persons by financial institutions in the United States, thereby affecting interstate commerce:

<u>Last 5 Digits on Front of Re-encoded Card</u>	<u>Last 4 Digits of Legitimate Card Number Encoded On Card</u>	<u>Issuer/ Type of Legitimate Card</u>	<u>Victim Account Holder</u>
76618	1002	American Express/credit	M.M.
07507	1006	Citi/American Express credit	J.G.

<u>Last 5 Digits on Front of Re-encoded Card</u>	<u>Last 4 Digits of Legitimate Card Number Encoded On Card</u>	<u>Issuer/ Type of Legitimate Card Number</u>	<u>Victim Account Holder</u>
Unknown	2006	American Express/credit	R.G.
97459	5005	American Express/credit	C.K.
59424	2005	American Express/credit	M.F.
40864	2006	American Express/credit	G.R.
14548	3007	American Express/credit	R.S.
74462	8005	American Express/credit	T.H.
97453	1005	American Express/credit	F.M.
37264	1012	American Express/credit	A.R.
14630	2003	American Express/credit	B.G
49047	1027	Citi/American Express credit	K.C.
97457	5009	American Express/credit	C.H.
14544	7666	PNC Bank/Visa debit	K.S.
45961	1005	American Express/credit	P.Z.
03181	3016	American Express/credit	D.P.
14542	2013	Delta Sky Miles/American Express credit	A.M.

All in violation of Title 18, United States Code, Sections 1029(a)(5) and 2.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraph 1 of Count One is incorporated here.

2. On or about October 29, 2014 in Philadelphia, Pennsylvania, in the Eastern District of Pennsylvania, defendant

AYGAZ USTYAN

knowingly and with the intent to defraud, possessed fifteen or more counterfeit access devices, thereby affecting interstate commerce.

In violation of Title 18, United States Code, Sections 1029(a)(3).

COUNTS THREE THROUGH SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 29, 2014, in the Eastern District of Pennsylvania, defendant

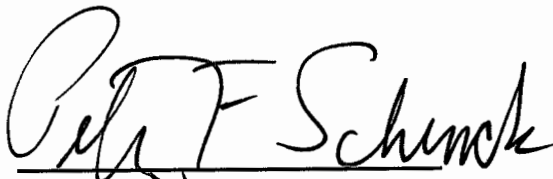
AYGAZ USTYAN

knowingly and without lawful authority, transferred or possessed a means of identification of another person, that is, the American Express or Visa account number of the persons indicated below, each person constituting a separate count, during and in relation to access device fraud:

<u>COUNT</u>	<u>ACCOUNT HOLDER</u>	<u>CARD ISSUER/ LAST FOUR DIGITS</u>
3	J.G.	Citi American Express/ 1006
4	K.S.	PNC Bank Visa/ 7666
5	C.K.	American Express/ 5005
6	G.R.	American Express/ 2006
7	A.M.	Delta Sky Miles American Express/ 2013

All in violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(4) and 2.

A TRUE BILL:



LOUIS D. LAPPEN
Acting United States Attorney